

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

vs.

**TELEFONAKTIEBOLAGET LM
ERICSSON AND ERICSSON INC.,**

Defendants.

**Civil Action No. 2:21-cv-213
(Lead Case)**

JURY TRIAL DEMANDED

GODO KAISHA IP BRIDGE 1,

Plaintiff,

vs.

**NOKIA CORPORATION, NOKIA SOLUTIONS
AND NETWORKS OY, AND NOKIA OF
AMERICA CORPORATION,**

Defendants.

**Civil Action No. 2:21-cv-215
(Member Case)**

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TO TIME TO TAKE DEPOSITION
AND RECEIVE DOCUMENTS OF DR. WILLIAM CHOI**

Defendants Ericsson and Nokia respectfully file this unopposed Motion to extend the fact-discovery deadline for the limited purpose of deposing and receiving documents produced by Dr. William Choi, an economist who IP Bridge used to support its methodologies described in documents produced in this litigation. IP Bridge does not oppose the requested relief.

IP Bridge disclosed Dr. Choi to Defendants on May 4, 2022—the last day of fact discovery—in connection with the meet-and-confers that led to Defendants’ filing their motion to compel. *See* Dkt. Nos. 108 (1st Amend. DCO) & 113 (Mtn. to Compel). The next day, Defendants told IP Bridge that it intended to serve a subpoena for documents and deposition on Dr. Choi, and

Defendants asked for confirmation that IP Bridge did not object to Dr. Choi's subpoena coming outside of the fact period given the circumstances. IP Bridge responded on Friday May 6, stating that it did not object and that it would have an answer next week regarding whether Ropes & Gray could accept the subpoena on behalf of Dr. Choi. Defendants sent notice of the subpoena to IP Bridge on May 10, and on May 11, IP Bridge notified Defendants that Ropes & Gray would accept service on behalf of Dr. Choi. Defendants attached the subpoena for service the same day.

Accordingly, Defendants respectfully request that the Court extend the fact-discovery deadline for the limited purpose of deposing and receiving documents produced by Dr. Choi. This extension will not impact any other deadline set by the Court in this case and is not made for purposes of delay.

Dated: May 23, 2022

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**COUNSEL FOR DEFENDANTS NOKIA
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OY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on May 23, 2022.

/s/ Nicholas Mathews

Nicholas Mathews

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that pursuant to Local Rules CV-7(h) and (i), counsel for Ericsson conferred with counsel for IP Bridge and counsel for IP Bridge indicated that they are unopposed to the relief sought herein.

/s/ Nicholas Mathews

Nicholas Mathews